

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

-----x	Chapter 11
In re:	
SEARS HOLDINGS CORPORATION, et al.	Case No. 18-23538 (RDD)
	(Jointly Administered)
Debtors	
-----x	Hearing Date: April 18, 2019, 10:00 a.m. ET Objection Deadline: April 11, 2019, 4:00 p.m. ET

**NOTICE OF MOTION BY DEDEAUX INLAND EMPIRE PROPERTIES TO COMPEL
DEBTOR IN POSSESSION TO ASSUME AND ASSIGN, OR, ALTERNATIVELY, TO
REJECT, UNEXPIRED LEASE ON REAL PROPERTY
(Sears Contract No. S8729-73-A)**

PLEASE TAKE NOTICE that a hearing on the annexed motion (the “Motion”) of **Dedeaux Inland Empire Properties (“Dedeaux Properties”)** to compel debtor in possession **Innovel Solutions, Inc., fka Sears Logistics, Inc. (“Innovel”)** to assume and assign, or, alternatively, to reject the unexpired lease concerning the facility located at 5691 Philadelphia Avenue, Ontario, California 91761 (“the **Ontario Lease**” and “the **Ontario Warehouse**,” respectively).

The hearing on the Motion will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 118, 300 Quarropas Street, White Plains, New York, 10601-4140 (the “Bankruptcy Court”) on April 18, 2019 at 10:00 a.m. (Eastern Time) (the “Hearing”), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion shall be in writing, shall conform to the Bankruptcy Rules and the Local Rules, shall be filed with the

Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted pro hac vice, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with the Amended Order Implementing Certain Notice and Case Management Procedures, entered on November 1, 2018 (ECF No. 405), so as to be filed and received no later than April 11, 2019 at 4:00 p.m. (Eastern Time) (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Motion, **Dedeaux Properties** may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order attached to the Motion and served herewith, which order may be entered without further notice or opportunity to be heard.

Dated: March 28, 2019
San Diego, CA

LAW OFFICE OF WILLIAM P. FENNELL, APLC

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Properties*